

DENTONS US LLP

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Presentment Date: December 27, 2019 12:00 PM

Objection Date: December 17, 2019

Attorneys for Defendants

Neil Reger Profit Sharing Keogh and Neil Reger

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
SECURITIES INVESTOR PROTECTION	:
CORPORATION,	:
	:
Plaintiff-Applicant,	:
	:
- against -	:
	:
BERNARD L. MADOFF INVESTMENT	:
SECURITIES LLC,	:
	:
Defendant.	:
-----X	
IRVING H. PICARD, Trustee for the Liquidation	:
of Bernard L. Madoff Investment Securities LLC,	:
	:
Plaintiff,	:
	:
- against -	:
	:
NEIL REGER PROFIT SHARING KEOGH and	:
NEIL REGER, individually and in his capacity as	:
sole trustee of the Neil Reger Profit Sharing Keogh,	:
	:
Defendants.	:
-----X	

Adv. Pro. No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05384 (BRL)

**DECLARATION OF ARTHUR H. RUEGGER IN SUPPORT
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Arthur H. Ruegger, hereby declare, under penalty of perjury pursuant to 28 U.S.C.
§1746, as follows:

1. I am an attorney with Dentons US LLP, counsel of record to Defendants Neil Reger Profit Sharing Keogh and Neil Reger, (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Dentons US LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on December 9, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendants retained Dentons US LLP to represent them.

4. Dentons US LLP first appeared on behalf of the Defendants by filing a Joinder in a motion to withdraw the reference on October 5, 2011 (ECF Doc. No. 10).

5. Differences have arisen which make it impossible for Dentons US LLP to continue to represent the Defendants.

6. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendants’ counsel.

7. Accordingly, cause exists to grant the application authorizing Dentons US LLP to withdraw as counsel for the Defendants.

Dated: December 3, 2019
New York, New York

/s/ Arthur H. Ruegger
Arthur H. Ruegger

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION :
CORPORATION, :

Plaintiff-Applicant, :

- against - :

BERNARD L. MADOFF INVESTMENT :
SECURITIES LLC, :

Defendant. :

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IRVING H. PICARD, Trustee for the Liquidation :
of Bernard L. Madoff Investment Securities LLC, :

Plaintiff, :

- against - :

NEIL REGER PROFIT SHARING KEOGH and :
NEIL REGER, individually and in his capacity as :
sole trustee of the Neil Reger Profit Sharing Keogh, :

Defendants. :

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ORDER GRANTING APPLICATION TO WITHDRAW AS COUNSEL

Upon consideration of the application of Dentons US LLP (the “Application”), for an order pursuant to Local Rule 2090-1(e) to withdraw as counsel of record for Neil Reger Profit Sharing Keogh and Neil Reger, (the “Defendants”); and due and sufficient notice of the Application having been given; and the Court having reviewed all pleadings and other papers filed in connection with the Application; and based upon the record of the case; and the Court having determined that the relief requested in the Application is in the best interests of the Defendants; and good and sufficient appearing therefor; it is hereby

ORDERED that Dentons US LLP is granted leave to withdraw as counsel for the Defendants and is hereby removed as counsel for the Defendants in this proceeding.

Dated: _____
New York, New York

Hon. Stuart M. Bernstein
UNITED STATES BANKRUPTCY JUDGE

DENTONS US LLP

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Attorneys for Defendants

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Plaintiff-Applicant, :

- against - :

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SECURITIES LLC, :

Defendant. :

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Plaintiff, :

- against - :

NEIL REGER PROFIT SHARING KEOGH and :
NEIL REGER, individually and in his capacity as :
sole trustee of the Neil Reger Profit Sharing Keogh, :

Defendants. :

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CERTIFICATE OF SERVICE

I, Arthur H. Ruegger, hereby certify that on December 3, 2019 I caused a true and correct
copy of the following documents:

- Notice of Presentment of an Order Granting Application to Withdraw as Counsel;
- Declaration of Arthur H. Ruegger in Support of Application to Withdraw as Counsel; and
- Proposed Order,

to be filed electronically with the Court and served upon the parties in this action who receive electronic service through CM/ECF, and served as indicated below:

By electronic mail and USPS First Class Mail upon:

Neil Reger
4476 Bocaire Blvd.
Boca Raton, FL 33487
neilreger@aol.com

and

David W. Jamison, Jr., Esq.
14550 Peace River Way
Palm Beach Gardens, FL 33418-8680
davidwjamisonjrpa@gmail.com

By electronic mail upon:

David J. Sheehan, Esq.
Elyssa S. Kates, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
dsheehan@bakerlaw.com
ekates@bakerlaw.com

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: December 3, 2019
New York, New York

/s/ Arthur H. Ruegger
Arthur H. Ruegger